

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS JOE ALEXANDROVICH
(OCA/USPS-T5-41-42)
September 17, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and request for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

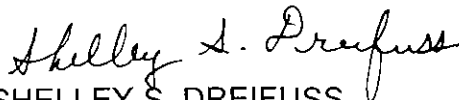
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T5-41. Please refer to your W/P B-3, W/S 3.2.1., page 2, n. b. Please state the location of the cited program. If it is not already on file with the Commission, please file it.

OCA/USPS-T5-42. In response to OCA/USPS-T36-25.i., witness Moeller states that "significant changes in the costing methodology make a direct comparison of [the letter/flat differential between Docket No. MC95-1 and Docket No. R97-1] difficult." OCA is experiencing the same difficulty as the Postal Service's own witness. In order for OCA to make this determination itself, please provide the following information:

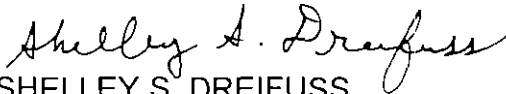
- a. For every cost component, list and describe all significant changes to cost attribution methodology in this proceeding.
 - i. Provide a citation for each change listed to: testimony of a Postal Service witness (by page and line), workpaper (by worksheet, page, column, and row), and/or Library Reference (by page and line), as appropriate. If the change has not been documented in any information already on file with the Commission, then provide such documents and give all citations.
 - ii. For each change listed in answer to part a., state whether it has the effect of causing level of attribution for the component to increase, decrease, or remain the same (choose one).
 - iii. If you are unable to provide the answers sought by this subpart, then please *redirect the questions (or portions of questions) to witnesses who can provide answers.*

- b. For every cost component, list and describe all significant changes to the distribution key(s) used in this proceeding.
- i. For each, state whether the distribution key change involves substitution of an entirely new distribution key or a significant alteration to an existing key.
 - ii. Provide a citation for each change listed to: testimony of a Postal Service witness (by page and line), workpaper (by worksheet, page, column, and row), and/or Library Reference (by page and line), as appropriate. If the change has not been documented in any information already on file with the Commission, then provide such documents and give all citations.
 - iii. For each change listed in answer to part b., give an additional listing of how each subclass of mail is affected, i.e., for each subclass indicate whether the new (or altered) distribution key causes the particular subclass' share of attributable costs to increase, decrease, or remain the same (choose one).
 - iv. For each effect listed in subpart b.iii., provide a citation to: testimony of a Postal Service witness (by page and line), workpaper (by worksheet, page, column, and row), and/or Library Reference (by page and line), as appropriate. If the effect has not been documented in any information already on file with the Commission, then provide such documents and give all citations.

- v. If you are unable to provide the answers sought by this subpart, then please redirect the questions (or portions of questions) to witnesses who can provide answers.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


SHELLEY S. DREIFUSS
Attorney

Washington, D.C. 20268-0001
September 17, 1997